

ORIGINAL

2 toct  
IN THE

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

5  
6/14/01  
FILED  
HARRISBURG

JUN 13 2001  
MARY ELIZABETH ANDREA, CLERK  
DEPUTY CLERK

WILLIAM DONALD MARSHALL,  
PETITIONER,

Civil No. 1:CV-01-0949

VS.

J. Rando

ROBERT L. RAIGER,  
RESPONDENT,

MOTION FOR EXTENSION  
OF TIME TO ANSWER  
RESPONDENT'S REPLY

COMES NOW PETITIONER who RESPECTFULLY REQUEST AN  
EXTENSION OF TIME WITH WHICH TO SUBMIT AN ANSWER  
TO RESPONDENT'S REPLY DATED JUNE 8, 2001 PURSUANT  
TO THIS COURT'S ORDER OF JUNE 5, 2001.

PETITIONER ASSERT THAT HE NEEDS AN ADDITIONAL FIFTEEN  
(15) DAYS TO THE FIFTEEN (15) DAYS ALREADY PROVIDED IN  
THIS COURT'S ORDER DATED JUNE 5, 2001 IN ORDER TO ACQUIRE  
EVIDENCE WHICH WILL PROVE TO THE CONTRARY OF RESPONDENT'S

REPLY STATEMENTS. IN <sup>2</sup>FURTHERANCE TO PETITIONER'S NEED FOR AN ADDITIONAL FIFTEEN (15) DAYS, SUCH ADDITIONAL TIME IS NEEDED IN ORDER TO ACQUIRE LEGAL REFERENCE MATERIAL IN THE LEBANON COUNTY LAW LIBRARY WHICH TAKES SEVERAL DAYS WHERE NO ADEQUATE LAW LIBRARY IS AVAILABLE AT THE LEBANON COUNTY CORRECTIONAL FACILITY. PETITIONER ALSO NEEDS THE ADDITIONAL TIME TO PROVE BY EVIDENCE THAT RESPONDENT'S Exhibit '2' IS A PRODUCT OF DECEPTION SINCE PETITIONER WHO IS 'LEGALLY BLIND' AS ONE OF SEVERAL SEVERE CONDITIONS ASSOCIATED WITH HIS 'ALBINISM', WAS UNABLE TO READ THE DOCUMENT REFERENCED AS Exhibit '2' SINCE <sup>HE</sup> WAS UNABLE TO RETRIEVE HIS READING MAGNIFIER FROM POCKET DUE TO HANDCUFF RESTRAINTS TO HIS BELT CENTER. PETITIONER HAVING SEEN THE DOCUMENT NOW FOR FIRST TIME AS NOW

RESPONDENT'S EXHIBIT '2' <sup>3</sup> WITH AID OF HIS READING MAGNIFIER  
WILL ASSENT THAT PETITIONER didn't KNOWINGLY WAIVE HIS  
SIXTH AMENDMENT RIGHT TO COUNSEL, RATHER ABSENT HAV-  
ING VISUAL AID DEVICE TO READ, PETITIONER WAS DECEIVED  
BY BEING TOLD TO SIGN HIS NAME BY THE 'X' & THAT TOO  
THE DISTRICT JUSTICE POINTED FINGER TO WHICH HE CLAIMED  
PETITIONER WAS MERELY ACKNOWLEDGING HIS RIGHTS AS THE  
COURT ONLY VERBALLY QUOTED SECOND PARAGRAPH 'AFFIDAVITS OF  
RIGHTS' YET THE COURT POINTED FOR PETITIONER TO SIGN IN  
TWO PLACES WHICH PETITIONER NOW SEES WITH HIS MAGNIFIER  
WAS TO WAIVE COUNSEL WHICH PETITIONER WOULD HAVE NEVER  
DONE HAD HE BEEN ABLE TO SEE WHAT HE WAS ASKED TO  
SIGN. NOTABLY, DUE TO NO VISUAL AID AT TIME OF BEING  
ASKED TO SIGN, PETITIONER'S SIGNATURE IS NOT ONLY

UNLEGIBLE, BUT NOT POSITIONED <sup>4</sup> OF SIGNATURE LINE.

WHEREFORE, PETITIONER PRAYS THAT THIS HONORABLE COURT  
GRANT AN EXTENSION OF TIME FOR HIM TO FILE HIS ANSWER  
TO RESPONDENT'S REPLY FOR TOTAL OF THIRTY (30) DAYS FROM  
DATE OF RESPONDENT'S REPLY I.E. JUNE 2, 2001.

DATED THIS 10TH DAY OF  
JUNE, 2001.

RESPECTFULLY SUBMITTED,

William Donald Marshall  
Pro Se, Petitioner

### Certificate of Service

This is to certify that I have served a copy of the  
foregoing on counsel for Respondent on the last day affixed  
above, and by U.S. Mail.

William Donald Marshall